

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

ROBERT HODGE (01)
DAVID HODGE (02)
DEVERK HODGE (03)
WILLIE HODGE, JR. (04)

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

No. 4:21-MJ- 626

SEP 21 2021

CLERK U.S. DISTRICT COURT
By: _____
Deputy

CRIMINAL COMPLAINT

I, Special Agent M. Young, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

From about May 2021 through about July 2021, in the Fort Worth Division of the Northern District of Texas and elsewhere, the defendants, **Robert HODGE, David HODGE, Deverk HODGE, and Willie HODGE Jr.**, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, that is to receive, possess, conceal, store, barter, sell, or dispose of any stolen firearm or stolen ammunition, or pledge or accept as security for a loan any stolen firearm or stolen ammunition, which is moving as, which is a part of, which constitutes, or which has been shipped or transported in, interstate or foreign commerce, either before or after it was stolen, knowing or having reasonable cause to believe that the firearm or ammunition was stolen.

In violation of Title 18 U.S.C. § 922(j) and 18 U.S.C. § 371.

Probable Cause:

I, Special Agent M. Young, under oath, duly state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF). The statements set forth in this affidavit are the product of my personal observations, training, and experience, as well as information obtained from other law enforcement officers and witnesses. The facts presented are true and correct to the best of my knowledge and belief but are not inclusive of all the evidence or information involved with this case.

1. There were at least three shipments stolen from XPO logistics from about May 2021, through about July 2021 totaling approximately 163 stolen firearms.
2. XPO tracking number 100-555313 regarded the theft of firearms from a Taurus shipment, shipped on April 29, 2021.
3. This shipment showed that pallets 4 and 9 did not make the original delivery. A single box from this shipment was put on XPO tracking number 363-488101. A total of 18 rifles and 24 pistols were reported in interstate theft/loss report numbers I20210002120 and I20210002119 respectively from this shipment.
4. One of these rifles, and one of these pistols were recovered and both individuals provided information about where they obtained the firearms. Source of Information 1 (SOI 1) initially stated that they got the rifle for free, but later said that they bought the rifle for \$190.
5. The SOI stated that they were contacted by **Robert HODGE**, via facebook. The SOI stated that **Robert HODGE** messaged them and said that he had rifles for sale. The SOI was unable to locate the correct facebook page for **Robert HODGE**. The SOI further stated that their facebook page had been hacked and they no longer had access to it.
6. The SOI said that **Robert HODGE** facilitated the purchase of the rifle from a man called “Duke” on the west side of Dallas at a park near the Mountain Valley Apartments, which is located at 5875 Mountain Valley Lane, Dallas, TX 75211.
7. The SOI described “Duke” as a B/M, in his 40s, with short hair, a short beard, 6’4, with a tattoo of US currency on his neck. The SOI said that “Duke” drove a long white Pontiac type sedan that was beat up and had roof and headlight damage.
8. The SOI said that **Robert HODGE** works a warehouse job for UPS or FEDEX.

9. The SOI was provided with a driver's license photo of **Robert HODGE**. The SOI said, "That is definitely him." An intelligence database query revealed that **Robert HODGE** has been employed with XPO Logistics from at least January 2019 through at least February 2021.
10. The SOI was provided an opportunity to update or correct their story, and they stated that they were embarrassed but that they were trying to cover for **David HODGE** and **Deverk HODGE**. The SOI said that their story was true except for the part about "Duke" and **Robert HODGE** contacting the SOI via facebook.
11. The SOI said that **Deverk HODGE** had contacted them via phone and told them that his dad, **David HODGE**, wanted to talk to the SOI about something.
12. The SOI said that they went to **David HODGE**'s apartment about three days later. The SOI said that **David HODGE** showed the SOI a photo of the rifle on a text message on **David HODGE**'s phone. The SOI said that **David HODGE** told the SOI that his brother, **Robert HODGE**, had rifles for sale. The SOI said that they would take one of the rifles.
13. The SOI stated that they returned to **David HODGE**'s apartment approximately three days to a week later and paid **David HODGE** \$190. The SOI said that **David HODGE** retrieved the firearm from behind or beside a couch in the living room and gave it to the SOI.
14. On May 20, 2021, **David HODGE** had a text message conversation with "D Hodge jr." telephone number 214-306-3074 (identified as **Deverk HODGE**), stating the following:
 - **David HODGE**: "And we got some more 22 rifles, only 5 left"
 - **Deverk HODGE**: "Uncle Robert do"
 - **Deverk HODGE**: "How much"
 - **Deverk HODGE**: "Can I see pic"
 - **David HODGE**: "Jr got them and going for \$175 brand new"
 - **David HODGE**: "Let me tell Jr to send me a pic"
 - **Deverk HODGE**: "I really want the shotgun tho"
 - **David HODGE** then posted a screenshot of Rossi rifles sent from Willie Jr, telephone number 214-245-7156 (identified as **Willie HODGE Jr**).

15. On May 21, 2021, **Deverk HODGE** texted **David HODGE** stating the following:
 - **Deverk HODGE**: “Garrod said he want rifle today or tomorrow”
 - **Deverk HODGE**: “Tomorrow or Sunday he said”
 - **David HODGE**: “Ok”
16. On June 17, 2021, **Robert HODGE** had a text message conversation with **David HODGE**, telephone number 469-544-2552, stating the following:
 - **David HODGE**: “Hey man you think you can get them bombs this weekend man cuz I’m trying to start moving in”
 - **Robert HODGE**: “Okay. How many”
 - **David HODGE**: “About 10”
17. On June 19, 2021, **Robert HODGE** had a text message conversation with “Clifton”, telephone number 214-669-2059 (identified as Clifton Beale), stating the following:
 - Clifton Beale: “Hey Robert.... Did u ask ur brother about the the guns? Do u know what kind they are and the price of them?”
 - **Robert HODGE**: “Stand by.”
18. When interviewed by ATF, Beale said that **Robert HODGE** had talked to him in person about some rifles that **Robert HODGE**’s brother had for sale.
19. Beale said that **Robert HODGE** stated his brother with the white “Jag” was the one who had the guns. Beale said that **Robert HODGE**’s other brother drives an old Tahoe, and his other brother is a minister. Beale said that one of the brother’s names is **Willie**, but did not know which brother was named **Willie** because the brothers look similar.
20. Beale said that **Robert HODGE** never got back to him regarding the firearms. Beale stated that he never bought a gun from **Robert HODGE**.
21. An intelligence database showed that **Willie HODGE Jr** has a white Jaguar XJ bearing TX tags PKH3152 registered to him. A white Cadillac Escalade bearing TX tags DK7T584 was also registered to **Willie HODGE Jr** through February, 2021, registered to an address in Fort Worth.

22. SOI 2 had a Taurus, model TX22, .22 caliber pistol, bearing serial number 1PT395132 on August 9, 2021. This firearm was stolen from XPO tracking number 100-555313 and interstate theft/loss report number I20210002119. This firearm was recovered by Fort Worth Police Department (FWPD).
23. SOI 2 stated that they bought the pistol on the Fort Worth side of Lake Arlington in about March or April. SOI 2 said that they bought the pistol for \$150 and stated that it was new in the box. SOI 2 said that they bought the pistol from an individual who usually drives a white Cadillac Escalade but was in a white sedan that day. SOI 2 described the seller as a B/M, "bright", late 40s to early 50s, medium build, hefty, with a mustache, and a limp.
24. SOI 2 said that the seller was at the lake three days in a row selling guns and estimated that he sold more than 20. SOI 2 said that he had a car full of guns. SOI 2 said that the name Charles came to mind but that they did not think that name was correct. SOI 2 stated that the seller said the guns were not stolen. SOI 2 said that all the guns they saw were Taurus .22s.
25. SOI 2 was interviewed again and stated that they had recently run into the individual who had sold the Taurus pistol at the lake.
26. SOI 2 showed agents photos of the individual on their phone. The details of the photo showed it was taken on August 24, 2021, at 2052, at Lake Arlington. SOI 2 said that the suspect drove a black Mercedes Benz sedan to the lake. SOI 2 said that they overheard the suspect say that he has all kinds of guns.
27. SOI 2 was shown a six photo lineup which included a photo of **Willie HODGE Jr.** SOI 2 picked Willie **HODGE** out of the lineup and said that is the man who sold the gun. SOI 2 circled Willie **HODGE**'s photo and initialed next to it.
28. When asked how sure they were that this was the individual who had sold the gun, SOI 2 said, "One thousand percent."
29. An intelligence database showed that **Willie HODGE** has a black Mercedes Benz C300 bearing TX tags HFF7009 currently registered to him at 3513 Terra Ct, Apt 3805, Fort Worth, TX.

30. The database also showed that **Willie HODGE** had co-title to another black Mercedes Benz C300 Bearing TX tags PDL7313. The registered owner of that vehicle is listed as Cishaun Hodge at 8470 Goldfinch Way, Dallas, TX.
31. A FWPD report revealed that on March 2, 2021, **Willie HODGE**'s white Cadillac Escalade bearing TX tags DK7T584 was observed on camera in the 3500 block of South Cravens Road, Fort Worth TX. 3500 South Cravens Road is very close to Lake Arlington.
32. XPO tracking number 326-199856 regarded the theft of 96 FN 503 pistols, shipped on June 30, 2021. This is related to theft/loss report number I20210002252. XPO provided video of this incident showing the pallet get loaded on the trailer on July 8, 2021.
33. According to the vehicle GPS for this shipment, the vehicle that this pallet was loaded onto had made an unscheduled stop on July 8, 2021, the last day the pallet of 96 FN pistols were accounted for. The vehicle also had stopped at a location from 1305-1527. Marvin BROWN was identified as the driver of the vehicle.
34. BROWN said that he broke down off highway 360 near Randol Mill Road, having made a U-turn, catching a line on a catwalk. BROWN stated that he called dispatch but no one answered. BROWN said that he then called **Robert HODGE**'s work phone. BROWN said that he was in about the middle of his route when this occurred.
35. BROWN said that he informed **Robert HODGE** that he broke down, needed an air line, and had a misload of an shipment intended for RSR Group (a firearms distributor). BROWN said that he knew RSR shipments were gun related but that he did not know this shipment was guns. BROWN said half the shipment was wrapped in black shrink wrap.
36. BROWN said that **Robert HODGE** brought him an air line. Video provided by XPO showed **Robert HODGE** leaving XPO on July 8, 2021, with an air line at about 1443.

37. BROWN said that **Robert HODGE** told him that he would take care of the guns. BROWN said that he gave the gun boxes to **Robert HODGE** pieced out, and that **Robert HODGE** did not take the pallet.
38. BROWN said that about one to two weeks later, **Robert HODGE** called BROWN and told him to meet at the Paradise gas station. BROWN said that **Robert HODGE** paid BROWN about \$1,000 to \$2,500. BROWN said that he thought the payment was “hush money” for the guns.
39. BROWN said that this was not pre-planned. BROWN said that it is unusual for **Robert HODGE** to come get misloaded freight as BROWN would typically bring it back to the warehouse at the end of his route, but BROWN said that he did not question it because **Robert HODGE** is a boss. BROWN said that he did not report this to anyone.
40. **Robert HODGE** had left XPO from 1444-1550 on July 8, 2021, according to the time on the camera system. XPO surveillance video showed that when **Robert HODGE** returned to XPO, he went to the trunk of his vehicle, opened it, and remained at the opened trunk, out of view of the camera, for about one minute before closing the trunk and walking back towards the office.
41. On July 8, 2021, **Robert HODGE** had a text message conversation with **David HODGE**, stating the following:
 - **David HODGE** at 0810: “Hey bro at work already”
 - **Robert HODGE** at 0824: “Yep”
 - **David HODGE** at 1747: “Hey bro I’m not going to meet with you today”
 - **Robert HODGE** at 1813: “Are you asking”
 - **David HODGE** at 1815: “Yup”
 - **David HODGE** at 1823: “Man my bad damn auto text”
 - **David HODGE** at 1823: “I’m asking are we still meeting today”
 - **Robert HODGE** at 2020: “On the way to the house”
 - **David HODGE** at 2049: “Ok”
42. On July 8, 2021 **David HODGE** texted **Deverk HODGE** at about 2325, showing a picture of a tan FN pistol and said, “Hey son look what we just hold of... and a lot of the FN 503.”

43. The image named 20210708_232345 on **David HODGE**'s phone shows an FN 503 next to a box with serial number CV019387 displayed on a sticker. This serial number is one of the 96 FN pistols reported on Interstate theft/loss report number I20210002252.

44. On July 9, 2021, the conversation continued:

- **Deverk HODGE**: "how much"
- **Deverk HODGE**: "don't let yo suck brothers sell em all this time"
- **David HODGE**: "Don't kno yet"
- **Deverk HODGE**: "Ok"
- **Deverk HODGE**: "Can u hold 2 of em 1 for me and u"
- **Deverk HODGE**: "Please"
- **David HODGE**: "I'll tell him"
- **Deverk HODGE**: "Did he say how much n would he save 1 or 2"
- **David HODGE**: "He said he will try and they 200 not nad."
- **Deverk HODGE**: "Not nad?"
- **David HODGE**: "Bad."
- **Deverk HODGE**: "Ask can he just save till Friday I get paid."
- **David HODGE**: "How many 1 or 2."
- **Deverk HODGE**: "Just 1."
- **David HODGE**: "Ok."
- **Deverk HODGE**: "Fr lol"
- **Deverk HODGE**: "How many it hold"
- **Deverk HODGE**: "That's a fn?"
- **David HODGE**: "Yup 503 its a 9mm with 2 clips and they hold 8"
- **Deverk HODGE**: "Ok"

45. On July 9, 2021, **David HODGE** texted "Squarl", telephone number 214-718-1729 (identified as **Robert HODGE**), stating the following:

- **David HODGE** : "Hey man, how much again"
- **Robert HODGE**: "200"

46. On July 10, 2021, **Deverk HODGE** texted **David HODGE**, stating the following:

- **Deverk HODGE**: "Slim wana buy one too can u get like 2 or 3 from him"
- **Deverk HODGE**: "2 people fasho wana buy one"
- **Deverk HODGE**: "4 if he got em"

- **David HODGE:** “Ok”
- **Deverk HODGE:** “6 of em if he got it”
- **David HODGE:** “Hot damn boy get it get it”

47. On July 10, 2021, **David HODGE** texted “My Queen”, telephone number 214-881-3403 (identified as Joella Hodge), stating the following:

- **David HODGE** sent a photo of an FN pistol
- **David HODGE:** “FN 503 9mm”
- **David HODGE:** “They going for 300”

48. On July 13, 2021, **Deverk HODGE** texted **David HODGE**, stating the following:

- **Deverk HODGE :** “Did uncle Robert say if he could get more or not”
- **David HODGE:** “he hasn’t call me back yet”

49. On July 13, 2021, **David HODGE** texted **Robert HODGE** stating the following:

- **David HODGE:** “Hey bro, got any more”
- **David HODGE:** “hello”
- **David HODGE:** “Hey bro they asking.”

50. On July 15, 2021, **Deverk HODGE** texted **David HODGE** discussing a firearm he was buying, **David HODGE** said, “All that money you made you should have got it out on the second round of 503s.”

51. On July 19, 2021 **Deverk HODGE** and **David HODGE** had a text message conversation, stating the following:

- **Deverk HODGE:** “I got the money too for the guns, do u know if he can get some more, slom textd today n asked,”
- **Deverk HODGE:** “Slim.”
- **David HODGE :** “I don’t know I think he’s still out of town.”
- **Deverk HODGE:** “Ok.”
- **David HODGE:** “I asked him when you get back but if you do can I get the proceeds from this batch so I can pay the bills over here.”
- **Deverk HODGE:** “Ok”

52. On July 20, 2021, **Deverk HODGE** and **David HODGE** had a text message conversation, stating the following

- **Deverk HODGE**: “wat ya boy say”
- **David HODGE**: “He’s going to check”
- **Deverk HODGE**: “Ok”
- **David HODGE**: “hey D did you get rid of all 3”
- **Deverk HODGE**: “Yea dats y I been askn for more.”

53. On July 21, 2021, **Deverk HODGE** and **David HODGE** had a text message conversation, stating the following:

- **Deverk HODGE**: “Did he see or naw”
- **David HODGE**: “He said he was going to check when he got to work but no answer yet”
- **Deverk HODGE**: “Slim keep askn so I asked again”
- **David HODGE**: “Its cool I’ll call him again”
- **Deverk HODGE**: “Ok”

54. On July 22, 2021, **David HODGE** texted **Deverk HODGE**, “Morning son he said he don’t have any right now but he checking and will get back with me”

55. XPO tracking number 326-199355 regarded the theft of 25 FN 509 pistols, shipped on July 27, 2021. This is related to theft/loss report number I20210002301. XPO provided video related to this event showing **Robert HODGE** remove two boxes from this shipment and later pull his vehicle up to the building on July 30, 2021.

56. On August 12, 2021, ATF executed a federal search warrant on **Robert HODGE**’s residence, located at 2002 River Canyon Lane, Garland, TX. During the search of the residence, law enforcement seized **HODGE**’s two iPhones and a carboard box with white tape bearing the FN logo, which was found inside of **HODGE**’s blue Ford Expedition bearing TX tags DXN7179.

57. The FN box had a sticker with barcodes on it. An internet search for the SKU# on the sticker, listed as 66-100780, revealed that the SKU is for an FN 509c pistol in the color Flat Dark Earth (tan). A representative from FN was provided with the barcode information listed on the box, which was

FNAFY25660. The representative advised that FYZ is the start of a lot number.

58. The representative provided documents that show that this lot number was shipped in one pallet in four boxes with a total of 48 firearms shipped, indicating 12 firearms per box.
59. The second barcode on the box showed to be FYZ256603. The representative advised that the number 3 at the end of the lot number would be the box number. The theft/loss report for this shipment shows that the serial numbers for the box recovered from **Robert HODGE**'s vehicle are 12 of the 25 firearms identified as missing from the RSR shipment where **Robert HODGE** is observed removing two boxes from the high value trailer at XPO logistics.
60. The documents also show that the XPO tracking number for this shipment was 326-199355, was destined for RSR, and shipped on July 27, 2021.
61. On July 30, 2021, **Deverk HODGE** and **David HODGE** had a text message conversation, stating the following:
 - **David HODGE** sends a photo of an FN pistol
 - **David HODGE**: "Hey he got these FN509 original price 844 on line so 450 or 500"
 - **Deverk HODGE**: "He selling for 450"
 - **David HODGE**: "he said 400 im saying 450 or 500"
 - **Deverk HODGE**: "ok gotcha how many he got"
 - **David HODGE**: "12"
 - **Deverk HODGE**: "Dude asked me about 509s too"
 - **Deverk HODGE**: "Ok I know somebody want some now"
 - **David HODGE**: "Let's go"
 - **Deverk HODGE**: "How many he can give"
 - **David HODGE**: "12"
 - **Deverk HODGE**: "Ok"
62. **David HODGE** had a photo of an FN pistol on his phone with the file name of 20210730_183411, likely indicating the picture was taken July 30, 2021 at 1834.

63. On August 2, 2021, **Deverk HODGE** and **David HODGE** had a text message conversation, stating the following:

- **David HODGE**: "Serious questions on how many of those guns did you get"
- **David HODGE**: "Cuz I only got five over here are supposed to have sex if you took six"
- **David HODGE**: "6"
- **Deverk HODGE**: "U gave me 6 or 7"
- **Deverk HODGE**: "N I had dat 1 already ill go look in trunk"
- **David HODGE**: "It had to be 7 then cuz I only got 5 over here"

64. On August 3, 2021, **Deverk HODGE** and **David HODGE** had a text message conversation, stating the following:

- **David HODGE**: "Hey son im I going to get some change out of this batch"
- **Deverk HODGE**: "U talkn bout from selling some"
- **Deverk HODGE**: Or from me selling em"
- **Deverk HODGE**: "Ill come when we leave the doctor for miya only got 50 from selling those cause it was already high n they talkn bout miya bill 150 cause of quick notice n her doctor booked today so she gotta see a di"
- **David HODGE**: "if you needed it its ok"

65. On August 12, 2021, at about 0814, **David HODGE** and Joella Hodge had a text message conversation, stating the following:

- **David HODGE**: "Morning they storm Robert house this morning"
- Joella Hodge: "Stfu"
- Joella Hodge: "Wow"
- **David HODGE**: "Yup"
- Joella Hodge: "He good"
- **David HODGE**: "Dkn"
- Joella Hodge: "Are they home"
- **David HODGE**: "Dkn"
- Joella Hodge: "It's me calling from rene home"

66. On August 12, 2021, starting at 0906, **Deverk HODGE** and **David HODGE** had a text message conversation, stating the following:

- **David HODGE**: "Damn son they got rober"
- **Deverk HODGE**: "Found him?"
- **David HODGE**: "Yup"

- **Deverk HODGE:** "Smh"
- **Deverk HODGE:** "They just called and left a message"
- **David HODGE:** "Dnt text or call"
- **David HODGE:** "Me"
- **David HODGE:** "Come by when get off"

67. On August 12, 2021, **David HODGE** had several calls from the following contacts between and 0808 and 1128. The contacts were as follows:

- Sandman- 469-334-9377
- Unknown- 214-735-6755
- My Queen- 214-881-3403
- Granny Madeia- 469-226-2099
- Hodge con-serv- 214-823-6544
- Willie Sr- 469-438-7375
- Unknown- 469-317-7675
- Willie Jr- 214-245-7156

68. **Robert HODGE** and **David HODGE** were both interviewed on August 12, 2021. **Robert HODGE** stated that he was given the FN box found in his vehicle by an individual named "Mike" who worked for another shipping company. **Robert HODGE** said the box contained 6 or 7 firearms and that he gave the firearms to **David HODGE**. **Robert HODGE** said that in the back of his mind he knew the guns were stolen.

69. **Robert HODGE** said that **David HODGE** gave him money to take back to "Mike," but that he did not get any money out of the arrangement.

70. **Robert HODGE** said that, regarding the two package that he is on video with where 25 FN pistols were stolen, he was told they were distressed freight by workers on the dock. **Robert HODGE** said that he looked up where they needed to go, he put the PO number on them, and set them by the supervisors office. **Robert HODGE** stated that the boxes were there when he left work that day and the next day they were gone.

71. **Robert HODGE** was asked about pulling his personal vehicle up to the front door of the building. **Robert HODGE** replied that he always pulls up to the front door. **Robert HODGE** said that he put soda that he ordered from the

individual who fills the vending machines. **Robert HODGE** stated that the soda he put in his vehicle was in his garage.

72. Referring to the gun boxes, **Robert HODGE** said that the boxes were really light and could be lifted with his fingers. **Robert HODGE** stated that guns boxes would have some weight.

73. **Robert HODGE** denied having been involved in anything more than this one box. **Robert HODGE** said that he only knew the FN logo from getting this box from "Mike." **Robert HODGE**, referring to the boxes with FN tape that he was on video with, said that he didn't know what was in those boxes but he did not think they were firearms.

74. **David HODGE** stated that he had received a carboard box from **Robert HODGE**, and that the box contained smaller cardboard boxes. **David HODGE** stated that he opened one of the boxes and saw a tan pistol inside.

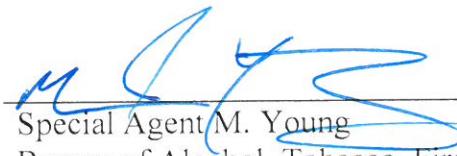
75. **David HODGE** said that he brought the box to an individual named Carlos Williams under the bridge at Rochester Park. **David HODGE** said that Williams could get \$300 per pistol. **David HODGE** stated that he gave the money from Williams, and the carboard box with black tape, back to **Robert HODGE**.

76. When asked if **David HODGE** knew that the guns were stolen, **David HODGE** indicated that he knew that the guns were stolen. **David HODGE** was told, "A licensed gun dealer wouldn't sell legit guns to 'Carlos' under the bridge." To which **David HODGE** agreed and stated, "nobody has a box of guns laying around."

77. **David HODGE** said that he did not give any guns to his son, **Deverk HODGE**.

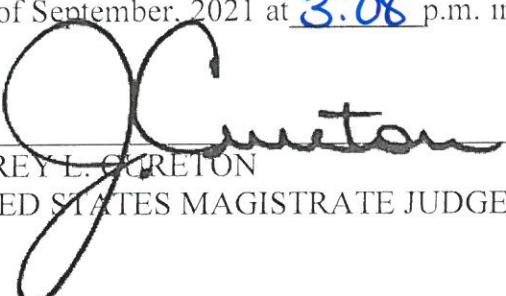
Based upon the above facts and circumstances, I submit there is probable cause to believe that **Robert HODGE**, **David HODGE**, **Deverk HODGE**, and **Willie HODGE Jr** willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, that is to receive, possess, conceal, store, barter, sell, or dispose of any stolen firearm or stolen ammunition, or pledge or accept as security for a loan any stolen firearm or stolen ammunition, which is

moving as, which is a part of, which constitutes, or which has been shipped or transported in, interstate or foreign commerce, either before or after it was stolen, knowing or having reasonable cause to believe that the firearm or ammunition was stolen..



Special Agent M. Young
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Sworn to me, over the telephone or other electronic means, and signed by me pursuant to Fed.R.Crim.P. 4.1 on this 21st day of September, 2021 at 3:08 p.m. in Fort Worth, Texas.



JEFFREY L. GURETON
UNITED STATES MAGISTRATE JUDGE